IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS SHERMAN DIVISION

BRIAN HUDDLESTON,

Plaintiff,

CIVIL ACTION No. 4:20CV447

JUDGE AMOS MAZZANT

v.

FEDERAL BUREAU OF INVESTIGATION and UNITED STATES DEPARTMENT OF JUSTICE,

Defendants.

<u>DEFENDANT FBI'S NOTICE OF SUPPLEMENTAL SEARCH DECLARATION</u> <u>AND VAUGHN INDICES</u>

During briefing of this case, Defendant Federal Bureau of Investigation (FBI) agreed to conduct two additional searches for records: (1) the FBI conducted a term search using the term "Crowdstrike" within the Special Counsel Office (SCO) investigative files and located three publicly acknowledged reports included in a production to Plaintiff on May 23, 2022; and (2) the FBI conducted additional targeted searches within the FBI's Counterintelligence Division and Operational Technology Division using search terms "Seth Conrad Rich", "Seth C. Rich" and "Seth Rich", which returned no additional records. The Seventh Declaration of Michael G. Seidel, attached as Exhibit 1, explains the procedures used to search for, review and process the additional responsive records; and in accordance with *Vaughn v. Rosen*, 424 F. 2d 820 (D.C. Cir.

1973), provide the FBI's justification for withholding information in part or in full pursuant to FOIA Exemptions 1, 3, 4, 6, 7(C), and 7(E), 5 U.S.C. §552 (b)(1), (b)(3), (b)(4), (b)(6), (b)(7)(C), and (b)(7)(E). This declaration and attached *Vaughn* indices are submitted in further support of Defendants' Motion for Summary Judgment [ECF 39] and all related briefing.

Respectfully submitted,

BRIT FEATHERSTON
UNITED STATES ATTORNEY

/s Andrea L. Parker

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CERTIFICATE OF SERVICE

I hereby certify that on January 20, 2023, a true and correct copy of the foregoing document was filed electronically with the court and has been sent to counsel of record via the court's electronic filing system.

/s/ Andrea L. Parker
ANDREA L. PARKER
Assistant United States Attorney